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Counsel for Air Line Pilots Association, International

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:	:	
	:	
	:	
	:	Chapter 11
	:	Case No. 05-17930 (ALG)
	:	
NORTHWEST AIRLINES CORPORATION, <u>et al.</u> ,	:	
	:	
	:	
	:	(Jointly Administered)
	:	
Debtors.	:	
	:	

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**STATEMENT OF ISSUES AND DESIGNATION OF RECORD ON APPEAL OF
APPELLANT AIR LINE PILOTS ASSOCIATION, INTERNATIONAL**

Appellant Air Line Pilots Association, International ("ALPA"), by its undersigned counsel, hereby submits this Statement of Issues and Designation of Contents of Record On Appeal with respect to its May 3, 2007, Notice of Appeal under 28 U.S.C. § 158(a) from the April 24, 2007, granting Debtors' Motion to Disallow and Expunge Claims Numbered 11283 and 11295 filed by the Association of Flight Attendants - CWA, AFL-CIO for the reasons set forth in the Court's Memorandum of Opinion dated April 13, 2007.

I. STATEMENT OF ISSUES

Appellant sets forth the following issues on appeal pursuant to Federal Rule of Bankruptcy Procedure 8006:

Whether the bankruptcy court erred in concluding that AFA does not have a claim for damages arising out of the rejection of its collective bargaining agreement with Northwest pursuant to Section 1113(c) of the Code, 11 U.S.C. §1113(c)?

II. DESIGNATION OF THE RECORD

ALPA hereby designates each of the items included in AFA's May 3, 2007, Designation of Items to Be Included in Record on Appeal and Statement of Issues Presented.

Respectfully submitted,

/s/ Richard M. Seltzer

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Dated: New York, New York
May 14, 2007

CERTIFICATE OF SERVICE

I, Richard M. Seltzer, declare that on this 14th day of May, 2007, a true and correct copy of the foregoing Notice of Appeal was served by electronic mail upon the following:

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